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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MANGO LABS, LLC,  
Plaintiff,  
-against-  
AVRAHAM EISENBERG,  
Defendant.

x  
Civ No. 1:23-cv-00665-LJL

**REPLY DECLARATION OF  
DAFYDD DURAIRAJ IN  
SUPPORT OF MANGO LABS,  
LLC'S APPLICATION FOR A  
PRELIMINARY INJUNCTION**

I, Dafydd Durairaj, submit this reply declaration in support of Plaintiff Mango Labs LLC's ("Mango Labs") Application for a Temporary Restraining Order and Preliminary Injunction against Defendant Avraham Eisenberg ("Defendant").

I am a member of Mango Labs, LLC. I have personal knowledge of the matters set forth below and, if called upon to do so, I could and would testify competently thereto.

1. The claims transfers from Mango Markets depositors are viewable on the blockchain, including their times of transfer, at this link:

<https://explorer.solana.com/address/m3roABq4Ta3sGyFRLdY4LH1KN16zBtg586gJ3UxoBzb>.

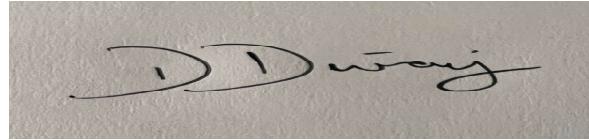
Attached as **Exhibit A** is a true and correct copy of portions of the website showing these claims transfers. As shown in the publicly accessible blockchain ledger linked above, the first transfer repudiating Defendant's purported agreement occurred on October 20, 2022, within one week of the vote.

2. On October 11, 2022, in the immediate aftermath of Defendant's attack, Defendant published an initial proposal to the Mango DAO entitled, "Repay bad debt." The terms proposed that Defendant keep more than half of the assets he unlawfully misappropriated. Mango DAO voters rejected Defendant's initial offer. Attached as **Exhibit B** is a true and correct copy of a webpage showing Defendant's initial proposal from Reddit, available at the following link:

[https://www.reddit.com/r/CryptoCurrency/comments/y1red6/the\\_individual\\_who\\_hacked\\_the\\_mango\\_protocol\\_has/](https://www.reddit.com/r/CryptoCurrency/comments/y1red6/the_individual_who_hacked_the_mango_protocol_has/). He deleted the language from the proposal webpage, so it is captured here.

3. Attached as **Exhibit C** are true and correct copies of communications sent from a third party detailing Defendant's plans to attack Mango Markets a second time using "alt" (alternative) identities to avoid detection.

I declare under penalty of perjury that the foregoing is true and correct. Executed this  
22nd day of February 2023 in San Francisco, California.

A handwritten signature in black ink on a light-colored background. The signature reads "Dafydd Durairaj".

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Dafydd Durairaj